

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
EDUARDO PARTIDA and	:	
LAURA LORENA PARTIDA,	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
EDUARDO PARTIDA and	:	
LAURA LORENA PARTIDA,	:	
Respondents	:	CASE NO. 1-19-bk-04918-HWV

TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 8<sup>th</sup> day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reason:

1. Trustee avers that Debtors' Plan is not feasible based upon the following:
  - a. The Plan is underfunded relative to claims to be paid. More specifically, the Plan will need to pay at least \$68,683.00 in order to be fully funded. The added legal fees underfund the Plan.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 8<sup>th</sup> day of April 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Dawn Marie Cutaia, Esquire  
Fresh Start Law, PLLC  
1701 West Market Street  
York, PA 17404

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee